

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**MICHAEL ESTRADA, individually  
and on behalf of others similarly  
situated,**

**PLAINTIFF,**

**v.**

**MAGUIRE INSURANCE AGENCY,  
INC.,**

**DEFENDANT.**

**CIVIL ACTION NO. 12-604**

**JURY TRIAL DEMANDED**

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**MOTION FOR WITHDRAWAL OF ATTORNEY IN CHARGE AND  
MEMORANDUM IN SUPPORT**

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TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

NOW COMES Caitlin Connors and Robert J. Wiley and asks this Court to allow Ms. Connors to withdraw as attorney in charge for Michael Estrada and to substitute Mr. Wiley as attorney for Mr. Estrada.

INTRODUCTION

1. Plaintiff is Michael Estrada. Defendant is Maguire Insurance Agency, Inc.
2. Plaintiff sued Defendant for violating the Fair Labor Standards Act.

ARGUMENT

3. There is good cause for this Court to grant the motion to withdraw because Caitlin Connors is no longer an attorney with Rob Wiley, P.C as of October 10, 2012.

4. Robert J. Wiley will be substituted as the attorney in charge for Plaintiff. His Texas bar number is 24013750 and he has been admitted in the Eastern District of Pennsylvania pro hac vice for this matter, and his office address, telephone number, and fax number are as follows:

ROB WILEY, P.C.  
1825 Market Center Blvd., Ste. 385,  
Dallas, Texas 75207  
Telephone: (214) 528-6500  
Facsimile: (214) 528-6511

5. Local Counsel will continue to be James A. Bell, IV and Christopher A. Macey, Jr. with the following contact information:

BELL & BELL LLP  
1617 John F. Kennedy Blvd. Ste. 1020  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 569-2500  
Fax: (215) 569-2220

6. Michael Estrada approves the substitution. The withdrawal and substitution will not delay these proceedings.

CONCLUSION

7. Caitlin Connors and Robert J. Wiley jointly request that Ms. Connors be withdrawn as counsel in this matter, and that Mr. Wiley be substituted and asks this Court to grant their joint motion.

Respectfully submitted,

By: /s/ Robert J. Wiley  
/s/ Caitlin Connors  
Robert J. Wiley  
Texas Bar No. 24013750  
*Board Certified in Labor and Employment Law*  
*Texas Board of Legal Specialization*  
Caitlin Connors  
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CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2012, I served a copy of this Motion on  
counsel for Defendants via the Court's CM/ECF system.

/s/ Caitlin S. Connors